

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

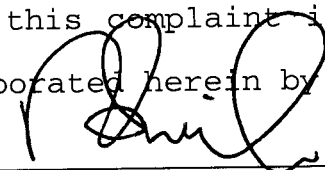
**'07 MJ 88 43**

UNITED STATES OF AMERICA	)	Magistrate Case No.:
	)	
Plaintiff,	)	COMPLAINT FOR VIOLATION OF
	)	
v.	)	21 U.S.C. § 952 and 960
	)	Importation of a Controlled
Eloise BIERLY Adame (1)	)	Substance (Felony)
	)	
Steven Daniel BIERLY (2)	)	
	)	
Defendants.	)	

The undersigned complainant being duly sworn states:

That on or about October 10, 2007, within the Southern District of California, defendants Eloise BIERLY Adame and Steven Daniel BIERLY, did knowingly and intentionally import approximately 61.98 kilograms (136.35 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Rafael Silva, Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 11th DAY OF OCTOBER 2007.

  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.  
Eloise BIERLY Adame (1)  
Steven Daniel BIERLY (2)

3 STATEMENT OF FACTS

4 This complaint is based on the reports, documents, and notes furnished to U. S.  
5 Immigration and Customs Enforcement Special Agent Rafael Silva.

6 On October 10, 2007, at approximately 2141 hours, Eloise BIERLY Adame and  
7 Steven Daniel BIERLY entered the United States from the Republic of Mexico via the  
8 Calexico, CA West Port of Entry. E. BIERLY was the driver and registered owner of a  
9 1994 GMC Suburban and her husband S. BIERLY was the passenger.  
10

11 CBP Officer Garcia received a negative Customs declarations from both driver and  
12 passenger. CBP Officer Garcia referred E. BIERLY, her husband and the vehicle to the  
13 vehicle secondary lot.  
14

15 In the vehicle secondary inspection area, CBP Canine Enforcement Officer  
16 Ragsdale, was requested to screen the vehicle with his Human/Narcotic Detector Dog  
17 (HNDD). The HNDD alerted to the gas tank of the vehicle. CBP CEO Ragsdale notified  
18 CBP Officer Carp of the alert. CBP Officer Carp obtained a negative Customs declaration  
19 from both subjects. CBP Officer Carp conducted a search of the vehicle, which revealed  
20 several packages hidden inside of the gas tank. CBP Officer Carp probed a package  
21 exposing a green leafy substance, which tested and proved positive for marijuana. A total  
22 of 36 packages with a net weight of 61.98 kilograms (136.35 pounds) were removed from  
23 the vehicle.  
24  
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26  
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